



8th August 2024
Our Ref: 23.156

The Planning Department
Development Management
Newport City Council
Civic Centre
Newport
NP20 4UR

(sent via email)

Dear Sir/Madam,

FULL PLANNING APPLICATION

PROPOSED DEVELOPMENT OF 42 NO. DWELLINGS, LANDSCAPE PLANTING AND ASSOCIATED WORKS ON LAND AT MON BANK SIDINGS, CARDIFF ROAD, NEWPORT, NP20 2PY

LRM Planning have been instructed to act on behalf of Monmouthshire Housing Association, in respect of the full planning application set out above.

Set out below is a list of the supporting information which accompanies this submission. The applicant intends to pay the submission fee (£19,320) directly to the LPA.

SUBMISSION DOCUMENTS

To assist in the consideration of this proposal, you will find enclosed the following plans and documents.

DOCUMENT DESCRIPTION	AUTHOR	REFERENCE
Completed form	LRM Planning	August 2024
Planning statement/covering letter	LRM Planning	August 2024
Design & Access Statement	LRM Planning	August 2024
Site location plan	LeTrucco Design	LTS2402.00.01 P1
Proposed site layout	LeTrucco Design	LTS2402.04.01 P1
Proposed Refuse Collection Strategy	LeTrucco Design	LTS2402.04.02 P1
Proposed Boundary Identification	LeTrucco Design	LTS2402.04.03 P1

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Proposed Materials Identification	LeTrucco Design	LTS2402.04.04 P1
Boundary Details	LeTrucco Design	LTS2402.04.05 P1
Shed Details	LeTrucco Design	LTS2402.04.06 P1
Proposed Street Elevations	LeTrucco Design	LTS2402.04.07 P1
House Type (2P 1B Flat) Plots 1-4, 8-11 & 9-12	LeTrucco Design	LTS2402.04.100 P1
House Type (4P 2B House) Plots 27-28 & 5-6	LeTrucco Design	LTS2402.04.101 P1
House Type (4P 2B House) Plots 5-7	LeTrucco Design	LTS2402.04.102 P1
House Type (4P 2B House) Plots 12-14	LeTrucco Design	LTS2402.04.103 P1
House Type (4P 2B House) Plots 18-20 & 24-26	LeTrucco Design	LTS2402.04.104 P1
House Type (4P 2B House) Plots 21-23	LeTrucco Design	LTS2402.04.105 P1
House Type (5P 3B House) Plots 7-8	LeTrucco Design	LTS2402.04.106 P1
House Type (5P 3B Flat) Plots 29-39	LeTrucco Design	LTS2402.04.107 P1
House Type (4P 2B House) Plots 15-17	LeTrucco Design	LTS2402.04.108 P1
Engineering Layout	PHG	2460 100 Rev B
Drainage Statement	PHG	2460 -May 2024 (2 nd Issue)
Flood Consequences Assessment	PHG	2460 -May 2024 (2 nd Issue)
Tree Survey	Treescene	November 2023
Tree Constraints Plan	Treescene	November 2023
Preliminary Ecological Assessment	Ecological Services	December 2023
Reptile Survey	Ecological Services	July 2024

Transport Statement	Lime Transport	23103d1
Site Investigation	Intégral Géotechnique	14234/FG/23/SI
Environmental Noise & Vibration Assessment	Hunter Acoustics	7069/ENS1_Rev 2
Planting and Management Plan	Catherine Etchell	621.02

This supporting statement is structured such that following a short description of the site and its context, a summary description of the proposed development is provided, followed by a review of the planning history. A short statement about planning policy framework is provided, taking into account the position and status of the site, followed by a summary appraisal of the land use planning considerations, together with a review of the comments received via the pre-application enquiry process.

SITE LOCATION & DESCRIPTION

The application site is formed by two land parcels which formed part of the Monmouthshire Bank Sidings strategic site for circa 575 dwellings (of which 517 were delivered leaving a residual balance of +58 dwellings) constructed by Redrow Homes and Llanmoor Homes; now fully completed. The site was formerly part of railway sidings owned by Network Rail who obtained permission for its redevelopment in January 2011, via the appeals process. The two parcels have a combined site area of 1.2 hectares/2.96 acres.

The site is located just outside of Newport City Centre on the southern side of Cardiff Road/B4237, an arterial road which links the City Centre, approximately 1.5km to the north-east and junction 28 of the M4, situated just over 2km to the south-west. Monmouth Castle Drive is the primary road feeding the wider housing estate, connecting from the south-eastern side of Cardiff Road and leading through to Docks Way to the south, which itself links onto the A48. Upon entry into the estate from Cardiff Road and onto the Monmouth Castle Drive, a roundabout leads onto two secondary estate roads of Abberley Hall Road, serving the northern parcel, and Capel Dewi Hall Road, serving the southern portion.

A cycle path has been delivered which provides pedestrian and cycle links to the network connecting from Cardiff Road to the north and linking to the wider cycle network to the south including National Cycle Route No. 4, London to Fishguard, and No. 47, Newport to Fishguard. Bus stops are located on Cardiff Road with the north bound being within 230m of the site and the south bound being 230m away. These stops provide regular services to Newport, Cardiff and Caerphilly together with other local destinations. The nearest train station is Newport Central which is located 1.8km to the north of the site.

The land binding the enquiry site is formed by the following;

- West/North-west - Cardiff Road and the railway line follow the boundary, with the site elevated above the railway line. Housing is located on the opposite side of Cardiff Road.
- South-west - Harlech Retails Park containing McDonalds fast food restaurant, Homebase, Tesco Superstore etc.
- South/South-east - the remainder of the housing allocation which has been completed. Beyond this lies Maesglas Industrial Estate
- North-east - the Whitehead Works housing allocation (H1(51)).

The site is well related in terms of proximity to surrounding facilities. The table below seeks to summaries a number of these facilities providing approximate walking distances from the site to the facility, together with average walking and cycling times.

FACILITY	DISTANCE FROM SITE (M/KM)	WALKING TIME (MINUTES)	CYCLE TIME (MINUTES)
Bus stop (Cardiff Road)	170/230m	3 mins	1 min
McDonald's Restaurant	240m	3 mins	1 min
Tesco Garage/Convenience Store	350m	5 mins	2 mins
Belle Vue Park	350m	5 mins	2 mins

Mon Bank Retail Park (veterinarian, dry cleaners, takeaways etc)	500m	7 mins	3 mins
Harlech Retail Park/Tesco Supermarket	550m	8 mins	3 mins
Post Office/Convenience Store	650m	9 mins	3 mins
Lidl Supermarket	700m	10 mins	4 mins
Cardiff Road Local Centre (takeaways, barbers, convenience stores etc)	800m	11 mins	4 mins
Gaer Primary School	900m	14 mins	7 mins
Royal Gwent Hospital	950m	13 mins	5 mins
Port Road Retail (Greggs, Starbucks, Dominos)	1.1km	15 mins	3 mins
St David's RC Primary School	1.2km	16 mins	5 mins
East Retail Park (B&M Bargains, KFC Restaurant, Halfords, Sports Direct, The Range, Gym)	1.3km	17 mins	4 min
Sirhowy Valley Walk	1.4km	20 mins	7 mins
Tredeggar Park	1.6km	23 mins	6 mins
Newport Central Train Station	1.8km	27 mins	11 mins

DEVELOPMENT PROPOSAL

The enquiry scheme proposes the erection of 42 affordable homes which comprise the following mix of house types/sizes.

TYPE/SIZE	OCCUPANCY	SIZE	NUMBER
3 Bedroom House	5 person	93m2	5
2 Bedroom House	4 person	84m2	21
1 Bedroom Apartment	2 person	51m2	16
TOTAL			42

The proposed dwellings, all of which are to be two-storey in height, are designed to comply with WDQR standards and Lifetime Homes, they will be non-fossil fuel dependant and will be EPC A rated.

The design and layout of the scheme has sought to respond to the site constraints and infrastructure which has already been implemented as part of the wider redevelopment.

The larger land parcel (parcel 1) contains 30 dwellings in total, the layout of which is largely driven by the completed infrastructure with dwellings strategically positioned to front over the main public highway (Abberley Hall Road), with short private drives and an adopted access and turning facility utilised to provide further units within the rear portions of the site, continuing the cul-de-sac approach. All of the units have enclosed rear private amenity space with sheds for secure bicycle storage and rear access gates to aid refuse/recycling transfer to kerbside. Additional tree and shrub planting is proposed to supplement the existing planting being retained around the perimeter of the site.

The smaller land parcel (parcel 2) proposes 12 dwellings and forms a cul-de-sac design. The dwellings are arranged such that they face into the site and the main access road and landscaped parking court. The buildings are two-storey in height and are formed through a mixture of the one-bedroom apartments and pairs of two and three bedroom houses, with the apartment block forming bookends to the row formed. A small landscaped area of open space is provided to the front of the northern apartment block. The embankment at the rear is to be retained with an acoustic fence (2.1m in height) indicated along the rear/western boundary. New tree planting and landscaped SuDS features are indicated to supplement the existing boundary planting being retained, with a new brick faced retaining wall to be formed around the parking court and open space area due to the change in levels.

All of the units are to be constructed from facing materials which will complement the existing housing immediately adjacent. It is anticipated that this is likely to be formed by facing brick and render and roofing slate albeit precise manufacturers details will be confirmed in due course. Rear boundaries are to be formed by timber fencing whilst more robust brick boundary walls are proposed as boundary treatments where within the public realm.

The development will be of a high quality of design and will improve the appearance of what is a vacant and disused site that has stood underused for an extended period of time. The development also successfully promotes a placemaking agenda, which as highlighted in PPW, is a key principle for successfully delivering sustainable development in Wales.

Car parking has been provided at a level considered to be appropriate considering the tenure and sustainable credentials of the site. As noted above, bicycle storage is provided for all units.

RELEVANT PLANNING HISTORY

The application site was indicated for B1 commercial use under the original outline planning permission (LPA Ref 07/0540) for the site. The associated legal agreement required the site to be marketed in order to identify a suitable developer or occupier for its intended use. However, it is understood that following this process no interest was found within the required two year period with the LPA subsequently confirming that the requirements of the legal agreement had been satisfied (email from Alun Lowe, Planning Contributions Manager, Newport Council 28 November 2017).

In looking at alternative uses for the site, the vendor engaged with a food retailer for the eastern part of the site with a planning application subsequently submitted in 2020 (LPA Ref 20/1068). However, this application was refused in November 2021 for reasons related to lack of justification over the retail need, cumulative impact upon the vitality and viability of the City Centre and being contrary to the aims of Active Travel.

The LPA will be aware that a pre-application enquiry was submitted last year with reference PRELET/P/23/0075. The advice received was positive in terms of the principle but raised some queries in terms of the design and further supporting information which would be required. These points are covered in detail below.

PLANNING POLICY CONTEXT

Future Wales: The National Plan 2040 and Planning Policy Wales – February 2024 (PPW)

The national policy context is acknowledged, but relevant policies are not listed here, in the interests of brevity.

Newport Local Development Plan - January 2015 ('LDP')

The Newport Local Development Plan (LDP) was adopted in January 2015 and provides the statutory development plan for the Authority. The site is within the settlement boundary as defined by the LDP and it is allocated for housing under LDP Policy H1 (14 -Monmouthshire Bank Sidings), forming part of the wider allocation for 575 homes.

Objective 1 (Sustainable Use of Land) of the LDP stipulates that all development should make the most efficient use of natural resources by seeking to locate development in the most sustainable locations, minimising the impact on the environment and making a positive contribution to local communities. The policy further notes that the Plan will seek to meet this objective by focussing development on brownfield sites.

Objective 4 (Housing Provision) seeks to ensure that an adequate supply of land for housing in the most sustainable locations is maintained. Also, it seeks to ensure that the quantity, quality and variety of housing meets the need of the population. This objective also seeks to foster the creation of places which contribute to local distinctiveness and thriving communities.

Additionally, the following policies are amongst those of most relevance.

- SP1: Sustainability
- SP3: Flood Risk
- SP9: Consequences of Natural, Historic and Built Environment
- SP13: Planning Obligations
- SP18: Urban Regeneration
- EM3: Alternative Uses of Employment Land
- GP1: Climate Change
- GP2: General Amenity
- GP4: Highways and Accessibility
- GP5: Natural Environment
- GP6: Quality of Design
- GP7: Environmental Protection and Public Health
- H1: Housing Sites
- H2: Housing Standards
- H3: Housing Mix and Density
- T4: Parking
- W3: Provision for Waste Management Facilities in Development

Whilst Newport have begun the preparation of the replacement LDP this is still at an early stage in the process and as such the adopted LDP remains material for development management purposes.

SUMMARY APPRAISAL

In land use policy terms, it is considered that the enquiry scheme is wholly acceptable being fully in accordance with guiding principles of both PPW and the development plan constituting the efficient reuse of previously developed land in a sustainable location delivering much needed housing, including affordable housing, for the local community.

Whilst the site was originally set-aside for business/commercial use as part of the outline permission, the vendor was unable to find any suitable interest following a period of marketing. As noted above, the LPA have previously confirmed that the requirements of the legal agreement which defines a minimum marketing requirements have been complied with and therefore the obligation has been satisfied.

In the absence of a suitable business use the vendor received interest from a retailer for part of the site with a planning application being prepared and submitted in November 2020. Following an extended appraisal period the application was eventually refused in November 2021 for the following reasons;

1. The proposal cannot demonstrate quantitative need for the proposed store and nor has sufficient qualitative need been shown to justify approval. This is contrary to national policy and to Policy R10 of the adopted Newport Local Development Plan 2011 - 2026.
2. The proposal would result in cumulative impact on the City Centre, which is identified as being vulnerable with a high percentage of vacancy rates and under trading of existing convenience retailers. The identified cumulative impact on the City Centre, alongside its vulnerability would result in a significantly adverse impact on the vitality and viability of the City Centre. This is contrary to national policy and to Policy R10 of the adopted Newport Local Development Plan 2011-2026.
3. The proposal does not support the aims of Active Travel. It proposes an over provision of car parking, in a car dominated layout, with minimal incentives to travel by other more sustainable means. This is contrary to national policy and to policies SP1, SP2, GP4 and R10 of the adopted Newport Local Development Plan 2011-2026.

In light of the above, it has clearly been demonstrated that the applicant has exhausted all lines of enquiry to find a suitable business/commercial use, with the LPA clearly unwilling to support a retail proposal for the reasons noted above. It is therefore appropriate to consider alternative options. With the site forming part of the wider housing allocation and given its sustainable position, this would form an obvious alternative use, with a scheme of affordable housing adding further weight to the planning merits.

The latest Annual Monitoring Report (AMR) dated October 2022, shows that the housing delivery in Newport, when comparing to its estimated trajectory, is falling short by 1,145 homes, which equates to a 14% shortfall. In terms of delivery of affordable housing the LDP has slightly under performed with 1,425 delivered set against an original target of 1,607, constituting a shortfall of 184 units.

Furthermore, Newport City Council Local Housing Market Assessment (2017 to 2022) calculated an annual shortfall of affordable houses in Newport to be 559 each year, equating to a lifetime of the Local Housing Market Assessment equal to 2,795. The ward which the site is located, Stow Hill, shows an annual shortfall of 67 homes (social rent) which is the joint fourth highest of all 20 wards. This figure rises to 73, the fifth highest, when other types of affordable housing are also considered.

In terms of delivery of employment land the AMR notes that overall, the delivery of allocated employment land has '*exceeded the yearly requirement, the amount of additional employment land permitted continued to grow and the amount of employment land lost remained low, which are all positives for the local economy.*' In concluding the AMR states '*good progress continues to be made with employment land delivery overall and as such it is considered that this indicator should remain green.*'

In light of the above, it is considered that the principle of the proposal which will deliver 42 much needed homes is justified, especially given the high housing need and shortfall of delivery and considering the employment land supply position. The vendor has also unsuccessfully marketed the site for employment use, satisfying the obligation set out in the original legal agreement, whilst the LPA have resisted a retail proposal for part of the site.

RESPONSE TO PRE-APPLICATION ADVICE

To further assist the appraisal process, this part of the statement intends to provide a response to the key comments raised through the pre-application advice process.

Density/Coverage -the original design proposed 47 units and as a consequence of addressing issues raised with the design, including highway geometry, the coverage has been slightly reduced. But still manages to comply with policy exceeding the minimum requirement.

Placemaking & amenity -the design of the scheme has been amended to take on board comments raised at pre-application stage. The scheme has sought to adopt detailing, architectural forms, features and a materials palette which aligns with the distinctive character of the wider estate. The use of facing brick, contrasting brick detailing, render and clay tiles tie in with the quality and architectural language, along with the inclusion of other features such as gablet details, canopies and aperture detailing further echo the distinctive character and quality of the wider estate. The grouping of units and arrangement around the existing estate road should provide interest in the street scene, uplifting the visual amenities of the site which acts as something of a gateway into the development.

The design has also been revised to ensure that dual aspect units are proposed at key corner turning locations to provide active frontages and also add interest to the street scene, avoiding instances where blank side elevations are prominently located or

unacceptable relationships between plots are proposed. The banked/tandem parking bay arrangement has been omitted and the number of small private driveways reduced. Furthermore, boundary treatment has been reviewed to ensure that robust brick feature walls are proposed in locations adjacent to the public realm or more prominently located with timber fencing elsewhere. An acoustic barrier to the railing way line is also proposed.

The layout and mixture of house types on the smaller parcel (parcel 2) has been revised with a less dense approach adopted, through the inclusion of less apartments, which has reduced the level of parking required and allowed for more landscaping and defensible space for future occupiers.

Highways & parking -comments received on the previous design, including highway geometry and forward visibility, have been considered and the design amended accordingly. The scheme is also provided with a refuse collection strategy to demonstrate how all of the properties can successfully manage refuse and recycling transfer to the kerbside.

All of the units are provided with bicycle storage within secure rear sheds. Car parking is provided at a reduced rate with each property having at least one space each whilst the largest three-bedroom houses have two spaces each. A total of nine visitor spaces are also proposed through the scheme. The parking reduction takes into account both the tenure and the sustainable credentials of the site, as justified within the accompanying Transport Statement.

Green Infrastructure/Net biodiversity benefit - the land parcels have been remediated and so whilst some evidence of regrowth is evident, this is relatively recent. A further ecological survey has been undertaken by Ecological Services which notes that the site has moderate biodiversity interest. Recommendations for an ecological buffer have been incorporated into the design, whilst other sensitive clearance techniques, along with the provision of bat and bird boxes along with new native planting will help ensure that the scheme minimises any loss and delivers a net biodiversity benefit, in accordance with PPW.

SAB/SuDS -scheme design has incorporated SuDS features to make provision for surface water drainage proposals. Features include a shallow detention basin with filter drain, along with permeable private parking bays and permeable drives. A separate application in respect of the SuDS design is to be pursued in parallel to the SuDS Approving Body (SAB).

Other matters - the application is supported by a range of reports and further information requested at pre-application stage. It is however requested that a Construction Environment Management Plan be secured through the imposition of a suitably worded condition, should Officers be minded to support the proposal.

I hope that this is of assistance and trust that I have provided all information required to validate and process this application. Should you have any queries however in the meantime, please do not hesitate to contact me.

Kind regards



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